

**EXHIBIT C**

**From:** [Joseph J. Zito](#)  
**To:** [Lamkin, Rachael](#); [William Ramey](#); [ken sheets \(Work\)](#)  
**Cc:** [Netflix-Valjakka](#); [Litigation Attorneys](#); [House, Ariel](#); [Gonzales, Natalie](#)  
**Subject:** Re: Scope of the Court's PI  
**Date:** Monday, November 6, 2023 5:02:58 PM

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Just for your knowledge, AiPi (which is not co-counsel on any matter, they are not a law firm) received DE#204 which is no longer under seal, on Friday (as did I). AiPi sent DE#204 to all "Licensees" today, (i.e. within ten days of it becoming a public document), including those Licensees that we do not believe are included in the PI:

**Akamai:** [jday@fbm.com](mailto:jday@fbm.com)

**Microsoft:** [spiepmeier@perkinscoie.com](mailto:spiepmeier@perkinscoie.com); [melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com)

**Sony:** [eric.buresh@eriseip.com](mailto:eric.buresh@eriseip.com); [abran.kean@eriseip.com](mailto:abran.kean@eriseip.com)

**Google:** [legal-notices@google.com](mailto:legal-notices@google.com)

**RPX:** [legal@rpxcorp.com](mailto:legal@rpxcorp.com)

Let me know if you have any questions.

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202-466-3500

On 11/6/2023 4:18 PM, Lamkin, Rachael wrote:

Dear Bill, Joe, Ken,

As you know, today we filed a Motion For An Order To Show Cause why Mr. Valjakka and his Agents should not be held in civil contempt for failure to comply with the Court's PI Order. Shortly, we will be filing a Motion To Join AiPi. In the next 2-3 days, we will file a motion to strike Valjakka's answer to our CUVTA counterclaim per the letter we sent to you on October 31, 2023 that went unanswered.

We also intend to file an Admin Motion requesting a CMC so that the Parties and the Court can resolve all of these pending issues/motions. Our 11/30 hearing may be most convenient, unless the Court can hear this sooner. Are there dates that would work for you for a CMC? The Court hears them on Tuesdays. We can be available on any Tuesday over the next month.

We would also like to propose that the Parties work together on an expedited briefing and discovery schedule so that we can preserve the trial date. Are you willing to engage in a discussion on an expedited schedule to preserve the trial date?

Finally, we again ask you to file an amended answer to our CUVTA counterclaim to avoid motion practice. See our letter of October 31.

We need to move quickly to try to preserve the trial date so **please advise within 24 hours** as to (i) which Tuesday in November you are available for a CMC, (ii) whether you are willing to work cooperatively on an expedited briefing schedule for the above motions and an expedited discovery schedule if the Court grants Netflix's motions, and (iii) if you will file an amended answer to Netflix's CUVTA counterclaim that properly responds to the factual allegations therein.

We appreciate your prompt response,

Rachael

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**From:** William Ramey <[wramey@rameyfirm.com](mailto:wramey@rameyfirm.com)>  
**Sent:** Wednesday, October 18, 2023 3:42 PM  
**To:** Joseph J. Zito <[jjzito@whitestone.law](mailto:jjzito@whitestone.law)>; Lamkin, Rachael <[rachael.lamkin@bakerbotts.com](mailto:rachael.lamkin@bakerbotts.com)>; ken sheets (Work) <[ksheets@aipisolutions.com](mailto:ksheets@aipisolutions.com)>  
**Cc:** Netflix-Valjakka <[Netflix-Valjakka@perkinscoie.com](mailto:Netflix-Valjakka@perkinscoie.com)>; Litigation Attorneys <[litattorneys@rameyfirm.com](mailto:litattorneys@rameyfirm.com)>  
**Subject:** RE: Scope of the Court's PI

[EXTERNAL EMAIL]

Hi Rachael,

We will review the Court's orders to ensure our compliance but we believe Joe is correct.

Thanks,

Bill

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**From:** Joseph J. Zito <[jjzito@whitestone.law](mailto:jjzito@whitestone.law)>  
**Sent:** Wednesday, October 18, 2023 5:00 PM  
**To:** Lamkin, Rachael <[rachael.lamkin@bakerbotts.com](mailto:rachael.lamkin@bakerbotts.com)>; William Ramey <[wramey@rameyfirm.com](mailto:wramey@rameyfirm.com)>; ken sheets (Work) <[ksheets@aipisolutions.com](mailto:ksheets@aipisolutions.com)>  
**Cc:** Netflix-Valjakka <[Netflix-Valjakka@perkinscoie.com](mailto:Netflix-Valjakka@perkinscoie.com)>; Litigation Attorneys <[litattorneys@rameyfirm.com](mailto:litattorneys@rameyfirm.com)>  
**Subject:** Re: Scope of the Court's PI

Confirmed, only to the extent that any "licensing or settlement assets" that are "held" by any other entities are in the "possession, custody or control" of Mr.

Valjakkka. I am not aware of any such assets. Thus your question is moot. To any greater extent, your assertion is denied.

Please refer to the PI Order that you drafted:

*"IT IS HEREBY ORDERED that Netflix Inc.'s request for Order enjoining Plaintiff Lauri Valjakka, pending trial, from using, moving, concealing, transferring, or otherwise disposing of any licensing or settlement asset in his possession, custody or control is GRANTED."*

Joseph J. Zito  
WHITESTONE LAW  
[jzito@whitestone.law](mailto:jzito@whitestone.law)  
202-466-3500

On 10/18/2023 5:17 PM, Lamkin, Rachael wrote:

Bill, Joe, Ken,

It is our understanding that the Court's PI Order extends to stay any Enforcement Assets held by the Ramey Firm and AiPi. Please confirm or deny.

Rachael

**Rachael D. Lamkin**

Partner

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